

July 22, 2021

VIA ECF

The Honorable Valerie E. Caproni
United States District Judge,
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

**Re: In re London Silver Fixing Antitrust Litigation,
Case No. 14-MD-2573 (VEC) (S.D.N.Y.)**

Dear Judge Caproni:

Pursuant to Paragraph 4 of the Fourth Amended Fact Discovery Schedule (Dkt. 526), the parties jointly submit this letter concerning the parties' proposal regarding the timing of expert discovery and the briefing of motions on class certification and for summary judgment.

The parties have met and conferred and agree that the next step in this case should be class certification. The parties jointly propose the following briefing schedule for class certification:

1. Plaintiffs to file their motion for class certification and supporting papers, including serving expert reports on Defendants, by **November 23, 2021**;
2. Defendants to file their opposition papers to class certification, including serving expert reports on Plaintiffs by **May 2, 2022**;
3. Plaintiffs to file their reply papers a on class certification, including serving rebuttal expert reports on Defendants by **July 29, 2022**; and
4. Expert depositions shall be concluded 30 days before the opposition and reply papers are due (adjusted for weekends) (that is, **April 4, 2022** for Defendants' depositions of Plaintiffs' experts and **June 29, 2022** for Plaintiffs' depositions of Defendants' experts);

The parties would propose a subsequent schedule for merits expert discovery and summary judgment after the Court's ruling on class certification.

Respectfully submitted,

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